

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**KENNETH BRYANT,
BRYANT ENTERPRISES, LLC**
Plaintiffs,

v.

CARSTEN JASON GALLINI
Defendant.

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Cause No. 24-986

PLAINTIFF’S ORIGINAL COMPLAINT

Kenneth Bryant and Bryant Enterprises, LLC, (individually, “Mr. Bryant” and “Bryant Enterprises”; collectively, “Plaintiffs”) respectfully file their Original Complaint against Carsten Jason Gallini (“Gallini” or “Defendant”).

I. INTRODUCTION

1. This case arises from the intentional and knowingly false, untrue and misrepresentative statements about Mr. Bryant that Defendant Gallini made and conspired to make in partnership with another individual, Bryan Fields (“Fields”). These statements intentionally and deliberately interfered with Plaintiffs’ contractual business relationships and prospective business relationships.

2. Defendant intentionally made such knowingly false, untrue and misrepresentative statements about Mr. Bryant in order to embarrass, humiliate and harm Plaintiffs, damage Plaintiffs’ reputation and standing in their profession/industry, render assistance in promoting competitive colleagues and dealers of Plaintiffs, and advance Gallini’s and Fields’ professional career, and for other means not currently known by Plaintiffs.

3. Gallini and Fields impeached Mr. Bryant in his profession, and, without justification, wrongfully interfered with Plaintiffs' agreements with Motorola, via their intentional and knowingly false, untrue and misrepresentative statements about Mr. Bryant.

II. THE PARTIES

A. PLAINTIFFS

4. Plaintiff Kenneth Bryant is an individual whose principal residence is located in Clay County, North Carolina.

5. Plaintiff Bryant Enterprises, LLC, is a limited liability company organized and existing under the laws of the State of North Carolina.

6. During all material times, Mr. Bryant was the sole manager and member of Bryant Enterprises, LLC, a North Carolina limited liability company, with a Georgia doing-business-as certificate as "North Georgia Communications." Mr. Bryant and Bryant Enterprises may be contacted through undersigned counsel.

7. During all material times, Mr. Bryant was and is an authorized Motorola radio dealer through Bryant Enterprises, LLC and North Georgia Communications.

B. THE DEFENDANT AND HIS CO-CONSPIRATOR

8. Defendant Carsten Jason Gallini is an individual whose principal residence is located in Williamson County, Texas. Defendant Gallini lives with his parents and owns and operates a sole proprietorship called CJ Radio Solutions, which is engaged in the two-way radio business. He may be served at 3813 Ashbury Road, Round Rock, TX 78681 or wherever he may be found.

9. Gallini conspired and entered into an enterprise with non-party Bryan Fields to defame Mr. Bryant. Bryan Fields is an individual whose principal residence is located in Pinellas County, Florida. During all material times, Fields was, and is, an employee of Nokia.

10. Fields himself has engaged in an extensive, continuous, and ongoing pattern of targeting individuals and damaging their professional reputations on the Internet through false, misleading and/or deceptive publications about them with the intent to interfere with such individuals' business relationships, including but not limited to: (i) eleven individuals through his www.FRCreform.org dispute from 2015 to 2017; (ii) six individuals through his www.AllStarLink.org dispute in 2019, (iii) one individual through his ARDC Dispute in 2019-20; (iv) at least three other individuals and organizations in 2019; (v) two individuals through a campaign of preparing and distributing adhesive stickers, and (vi) other individuals and organizations not known currently by Mr. Bryant. A collection and summary of Fields' past cybersmear conduct is attached and incorporated hereto as **Exhibit 1** and **Exhibit 2**.

11. Fields continued this pattern by knowingly and intentionally engaging in the conduct with the specific intent to embarrass and humiliate, cause mental anguish, and damage Mr. Bryant's professional reputation, as well as engage in a call-to-action campaign to their audience to cease doing business with Plaintiffs, all of which such efforts were successful. For reasons unknown, Gallini partnered with Fields to defame Mr. Bryant.

12. Gallini and Fields therefore acted in concert and aided-and-abetted each other in their campaign to disparage and harass and torment Plaintiffs as described below. Gallini posted links to defamatory information about Mr. Bryant at the direction and under the guidance of Fields, who himself had gathered and prepared this information.

13. Fields employed and utilized Gallini to make unlawful, tortious, and offensive postings on the Internet that disparaged and otherwise harmed Plaintiffs Bryant.

III. JURISDICTION AND VENUE

14. The Court has subject-matter jurisdiction over this matter under 28 U.S.C. § 1332 because the parties are diverse and the amount in controversy exceeds \$75,000. Plaintiffs Mr. Bryant and Bryant enterprises are citizens of North Carolina. Defendant Gallini is a citizen of Texas. Plaintiffs seeks over \$75,000 in economic and emotional damages.

15. Venue is proper in this district under 28 U.S.C. § 1391(b) because a substantial part of the events or acts giving rise to Plaintiffs' claims occurred in this district and Gallini resides in this district.

IV. FACTUAL ALLEGATIONS

A. GALLINI AND FIELDS ENTER A CONSPIRACY AND JOINT ENTERPRISE TO DEFAME PLAINTIFFS.

16. During all material times, Gallini and Fields knew that Mr. Bryant was an authorized Motorola dealer.

17. During all material times, Fields was employed by Nokia as a Senior Consulting Engineer.

18. On or about May 7, 2022, Fields published content about Mr. Bryant in the Facebook Motorola P25/TRBO/TETRA Users Group ("**Facebook Motorola Group**"), which is a private Facebook group located at <https://www.facebook.com/groups/1544491192475817> dedicated to professional discussions regarding Motorola Solutions equipment, and specifically Motorola series radios and Motorola branded two way radios. A copy of this posting is attached as **Exhibit 3**.

19. When Mr. Bryant discovered this May 7, 2022, publication about him by Fields on the Facebook Motorola Group, Mr. Bryant believed that he knew Fields because the two were Facebook “friends.” Mr. Bryant therefore sent Fields a “private” Facebook message asking why Fields was making defamatory posts about him in their common profession/trade social media groups.

20. As it turns out, Mr. Bryant’s acquaintance had a name similar to “Bryan Fields,” but was not the person who posted the defamatory statements. Fields then attempted to distort this simple case of mistaken identity (of Mr. Bryant confusing Fields with another person having a similar name) to deflect attention from Fields’ defamatory posts.

21. After receiving Mr. Bryant’s private Facebook message, Fields continued his information warfare and document doxing campaign against Mr. Bryant that damaged Mr. Bryant’s professional reputation and interfered with Mr. Bryant’s business agreements, and professional and prospective relationships.

22. At an unknown time and for unknown reasons, Gallini partnered with Fields and conspired with him to make and publish defamatory statements about Mr. Bryant. The beginning of their partnership and conspiracy is evidenced by:

- Gallini’s early knowledge of websites created by Fields to defame Mr. Bryant—these websites are obscure, yet Gallini shared them on Facebook within one week of their creation in June 2022;
- Gallini’s familiarity with and fondness for Fields, exhibited in his Facebook post from June 2022, which referred to Fields as “Batman” and mused about when Fields might create his signature stickers to further insult Mr. Bryant; and
- Fields’ access to private messages between Gallini and Mr. Bryant—Fields could have only obtained these messages from Gallini, yet had shared them on his website by June 2022.

23. On or about June 11, 2022, Fields and Gallini began distributing and making these intentional and knowingly false statements about Mr. Bryant through various websites, blogs, and/or social media publications. Gallini also distributed the defamatory statements through Facebook, at the direction and under the guidance and instruction of Fields.

24. Gallini's and Fields' intentional and knowingly false, untrue, and/or misrepresentative statements about Mr. Bryant began on June 11, 2022, and were published to multiple persons in Mr. Bryant's profession/trade at one or more of the following venues:

A. **"Facebook Motorola Group" –**

<https://www.facebook.com/groups/1544491192475817/permalink/3172834516308135>

Attached and incorporated hereto as **Exhibit 4** is a copy of Gallini's and Fields' defamatory statements about Mr. Bryant that they published in concert at the Facebook Motorola Group, in furtherance of their conspiracy and joint enterprise;

B. Three Wiki pages:

1. **"Bryan Fields main Wiki Page" –**

https://wiki.w9cr.net/index.php?title=Main_Page&oldid=7280

Attached and incorporated hereto in **Exhibit 5** is a copy of the Bryan Fields main Wiki Page which states, "Ken Bryant, K1DMR of North Georgia Communications doesn't want you to see this."

2. **"Ken Bryant Wiki Page" –**

https://wiki.w9cr.net/index.php/Ken_Bryant

Attached and incorporated hereto as **Exhibit 6** is a copy of Gallini's and Fields' defamatory statements about Mr. Bryant that they published to others at the Ken Bryant Wiki Page;

3. **"Federal Agent Wiki Page" –**

https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent

Attached and incorporated hereto as **Exhibit 7** is a copy of Gallini's and Fields' defamatory statements about Mr. Bryant that they published to others at the Federal Agent Wiki Page;

C. **"Fuckhams.com Postings" –**

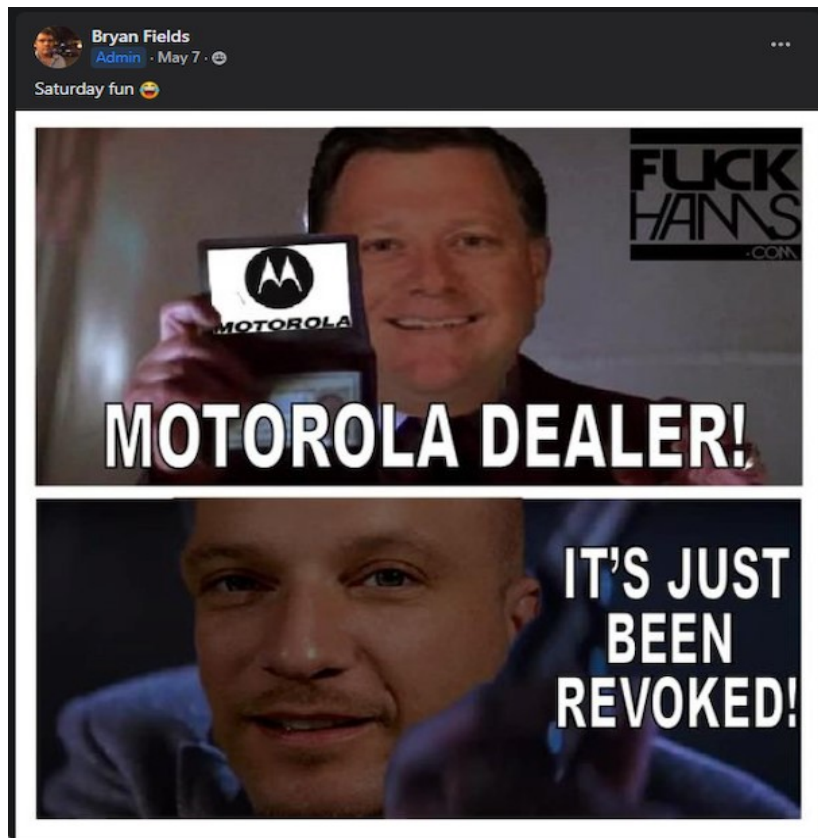
<https://www.fuckhams.com/mot/index.html>

Attached and incorporated hereto as **Exhibit 8** is a copy of Gallini's and Fields' defamatory statements about Mr. Bryant that they published to others at the Fuckhams.com Postings, and

D. Other websites, social media sites and blogs not known currently by Mr. Bryant.

25. Gallini's and Fields' intentional and knowingly false, untrue and/or misrepresentative statements about Mr. Bryant began on or about May 7, 2022, and were published at Facebook Motorola Group to multiple parties in Mr. Bryant's profession/trade, including but not limited to:

A. "Motorola Dealer!" "*IT'S JUST BEEN REVOKED!*" with Mr. Bryant's picture posted on the "*Motorola Dealership*" frame:



- B. Commenting that the person's photo in the "Revoked" frame was the "*Motorola VP of Channel Partners*" (which is Motorola's term for dealers); and
- C. Publishing that Mr. Bryant *did not earn "High Honors"* with his Master's Degree in Criminal Justice by publishing "*With the exception of JD (law) degrees, Latin honors are not something you get in grad school.*"

26. Gallini's and Fields' intentional and knowingly false, untrue and/or misrepresentative statements about Mr. Bryant that began on or about June 11, 2022, and were published at Ken Bryant Wiki Page to multiple parties in Mr. Bryant's profession/trade, include but are not limited to:

- A. "*Apparently he's a scummy realtor too*";
- B. By knowingly accessing, copying and publishing non-public Pacer records from a dark-web location when Fields knew such records were obtained from renowned hacker Aaron Swartz, who was found guilty of unauthorized access to private court files electronically stored in an encrypted Public Access to Court Electronic Records (PACER) depository and scraping and stealing these records. The non-

public stolen court records that Gallini and Fields knowingly copied and published from this dark-web location included Plaintiff's expunged and vacated records that are no longer publicly accessible in PACER. Gallini and Fields published these non-public stolen records under multiple posts, including but not limited to: "*Looks like he's [Mr. Bryant] an admitted whacker, radio pirate and a former convicted felon too!*"; and

C. "*Bryant may be insane.*"

27. Gallini's and Fields' intentional and knowingly false, untrue and/or misrepresentative statements about Mr. Bryant that began on or about June 11, 2022, and were published at Federal Agent Wiki Page to multiple parties in Mr. Bryant's profession/trade, include but are not limited to: publishing stolen non-public court records about Mr. Bryant (*i.e.*, Aaron Swartz's PACER records); publishing Mr. Bryant's date of birth, North Carolina address, signature, medical records and other private personal information; accusing Mr. Bryant of criminal acts; engaging in a document doxing campaign that encouraged others to harass, embarrass and humiliate Mr. Bryant; and encouraging others to join their joint enterprise in hurting and damaging Mr. Bryant by, amongst other things, not doing business with him.

28. Gallini's and Fields' intentional and knowingly false, untrue, and/or misrepresentative statements about Mr. Bryant that began on or about June 11, 2022, and were published at Fuckhams.com and sent to multiple parties in Mr. Bryant's profession/trade groups or circles, include but are not limited to:

A. "Motorola Dealer!" "*IT'S JUST BEEN REVOKED!*" with Mr. Bryant's picture posted on the "*Motorola Dealership*" frame as described above;

B. Commenting that the person's photo in the "Revoked" frame was the "*Motorola VP of Channel Partners*" (which is Motorola's term for dealers).

B. GALLINI AND FIELDS CREATE AND DISSEMINATE DEFAMATORY MAILERS.

29. In or about May 2023, Gallini and Fields created and published additional defamatory materials in furtherance of their conspiracy to harm Mr. Bryant. These documents

incorporated Plaintiffs' images, names, websites, and likeness for the purpose of harassing Plaintiffs and for the purpose of directing persons to the website created and maintained by Fields, for the purpose of, *inter alia*, providing Plaintiffs' competitors with an unfair advantage, and directing persons to Fields' website, which actively solicits persons visiting the site to make payments by cryptocurrency, stating, "I support strong crypto. My gpg key is below, please use it."

30. Gallini confirmed his participation in the creation and / or dissemination of these material, in part, by revealing his knowledge of their existence in early May, 2023, before they were distributed to the wider public.

31. One of the documents that Gallini and Fields created is a self-adhesive sticker depicting the name, call sign, corporate logo for the Plaintiff business and a photograph of Mr. Bryant:



32. This sticker has a QR code which directs the viewer to the website created by Fields and described above. A person viewing the sticker would infer and understand that the

sticker was created and distributed by Plaintiffs, with their knowledge and consent, that the QR Code on the sticker directs the user to Fields' website, and that Plaintiffs endorse the messages on the sticker.

33. The use of such a sticker is a hallmark of Gallini's and Fields' joint enterprise of defamation, and the two conspirators have a history of creating stickers with images of persons whom they are defaming and harassing, as alleged above.

34. Further, Gallini and Fields had already discussed creating stickers depicting Mr. Bryant in open public forums, such as Facebook, with a design and intent to further harass and defame him.

35. The other document created by Gallini and Fields in or around May 2023 is a document resembling a business card:



36. On both sides of this business card, Gallini and Fields printed the name "Ken Bryant" and used Mr. Bryant's unique radio call sign ("K1DMR"), as well as Plaintiffs' company name and corporate logo ("North Georgia Communications," a d/b/a of Plaintiff Bryant Enterprises) and URL that leads to the defamatory Ken Bryant and Federal Agent Wiki pages (www.ngacoms.com). The front of the card describes Bryant Enterprises as "A Full Service Two-Way Lawsuit Generating Enterprise," while the back states "I'm a Motorola Channel Partner! I own a Motorola Dealership!" and encourages readers to "Scan For Deals."

The QR code available to scan also leads readers to the defamatory Ken Bryant and Federal Agent Wiki pages.

37. The URL described in the preceding paragraph (www.ngacomms.com) is deceptively similar to Plaintiffs' actual website (www.ngacomms.com). Fields intentionally omitted one letter "M" from the URL he created, and he and Gallini used this confusing similarity to mislead the public to a false and defamatory website.

38. The URL registrar for this website is little known and not widely used but has been the sole registrar used by Gallini and Fields in their past cyber smear campaigns against Plaintiffs and others.

39. The registration for this URL is attributed to an owner of DMR-MARC (located in Illinois), but the actual registrar is, and registrations were conducted from, an IP address in the general location where Fields resides near Tampa, Florida.

40. From May 19, 2023 to May 21, 2023, a convention of ham radio operators, vendors and enthusiasts, known as "Hamvention," took place near Dayton, Ohio. First started in 1952, Dayton Hamvention is often referred to as the "mecca" for amateur radio. The Dayton Hamvention is one of the two largest amateur radio conventions (or hamfests) in the world. It is held each May in the Dayton, Ohio area and draws attendees from various parts of the world. Prior to the COVID pandemic, the 2019 Hamvention drew 32,462 paid attendees over its three days.

41. In addition to six buildings full of commercial exhibit space, this convention had thousands of vendor booths of ham radio equipment and was visited by thousands of ham radio customers and enthusiasts in addition to forums, classes, licensing examination sessions and demonstrations covering all aspects of Amateur Radio.

42. In furtherance of their conspiracy, Gallini and/or Fields caused the stickers and false business cards to be displayed at this convention in highly visible places. Several of these stickers (a much larger version than the stickers posted in the US Mail and mailed to various unknown individuals throughout the US) were placed near and adhered within urinals at the convention site. Gallini himself has admitted to attending this convention where the stickers and business cards—of which he demonstrably had previous knowledge—were shared.

43. Also, in furtherance of their conspiracy, Gallini, Fields, and/or their agents further distributed and disseminated their fraudulent stickers and business cards by mailing them to numerous people, in an envelope bearing a return address for DMR-MARC, is the Motorola Amateur Radio Club, which is one of the original founding DMR (“digital mobile radio”) networks and is extremely popular among Motorola users and amateur radio operators. DMR-MARC is the oldest and most respected amateur network in the world and arguably the largest in the world.

44. DMR-MARC consists of over 500 repeaters in 83 countries with over 144,000 registered users. There are over 6600 registered DMR repeaters world-wide in the DMR-MARC database, all amateur radio operators, many of whom are Motorola Solutions employees, Motorola Service Station employees, dealers, system installers and Motorola equipment aficionados. For point of reference, Plaintiffs’ business is that of a Motorola two-way radio dealer.

45. Ham radio operators would readily recognize the name DMR-MARC, would have interest in reading notices from DMR-MARC, and would give credibility to documents sent by DMR-MARC.

46. The image below is a sample of the envelope prepared by Gallini and Fields purporting to be issued by DMR-MARC:



47. Gallini and Fields, by sending the fraudulent stickers and false business cards in envelopes that falsely utilized the name and return address for DMR-MARC, created the false impression that DMR-MARC endorses and supports this campaign of harassment, encouraging recipients to view the contents of the envelope as credible.

48. DMR-MARC has stated that it knows nothing about these mailings bearing its name and does not endorse them. It did not create or disseminate the sticker or the business card.

49. By sending or conspiring to send fraudulent stickers and business cards in the United States mail system, Gallini and Fields have violated 18 U.S.C. § 1341, pertaining to mail fraud, along with public policy.

50. By creating, using, and disseminating the defamatory business cards and stickers, Gallini and Fields wrongfully appropriated Plaintiffs' likenesses, names, and personal and corporate identities, resulting in damages to Plaintiffs, and did so for the purpose of commercial gain. *See, e.g., Doggett v. Travis Law Firm, P.C.*, 555 S.W.3d 127, 130 (Tex. App.—Houston [1st Dist.] May 2018) (citing additional Texas cases) (“The three elements of invasion of privacy

by misappropriation are (1) the defendant appropriated the plaintiff's name or likeness for the value associated with it; (2) the plaintiff can be identified from the publication; and (3) there was some advantage or benefit to the defendant.”).

C. GALLINI AND FIELDS RE-ISSUE THE DEFAMATORY CARDS AND STICKERS, AND CREATE A NEW LIBELOUS LETTER.

51. In September 2023, Gallini and Fields began mailing more copies of the defamatory business cards and stickers described above. Along with those items, they mailed a new libelous and defamatory letter (“Letter”), attached as Exhibit 9. An unknown number of these mailers were sent to an unknown number of individuals across the United States. Attached as Exhibit 10 are two examples of envelopes that Gallini and Fields used to disseminate their mailers.

52. Knowing that their Letter contained false and defamatory content and would subject them to further liability, Gallini and Fields wrote it under the pseudonym “Marc Deemer.”

53. An extensive investigation has revealed that the purported author “Marc Deemer” is a false pen name and that no such person exists and cannot be verified in the public record.

54. The Letter contains false and defamatory matters about Plaintiffs, including but not limited to alleging that (1) Mr. Bryant’s resume is “choked full of lies and BS claims,” (2) Mr. Bryant was suing ham radio operators for publishing his court records, (3) Plaintiffs were removed from a network for selling radios over the air, (4) Plaintiffs’ Motorola dealership sells “whored out” radios, (5) Plaintiffs overcharge for Motorola products, (6) Plaintiffs tamper with OEM equipment, (7) Plaintiffs engage in the theft of intellectual property, (8) Plaintiffs damage OEM equipment, and (9) Mr. Bryant is a “convicted felon, serial liar and fraudster.”

55. The Letter also encouraged ham radio operators and dealers to “not engage with him [i.e. Mr. Bryant and his business],” thereby intentionally advising the persons receiving the Letter to not purchase Motorola and other equipment from Plaintiffs.

56. The Letter further encouraged the recipients to distribute the business cards and stickers “at upcoming hamfests spreading the word about Ken Bryant.”

57. The Letter further seeks to impair Plaintiffs’ business and to discourage potential customers from purchasing equipment from Plaintiffs by alleging that Mr. Bryant is “a sue happy individual,” warning readers to “not engage with him, or you may find yourself the target of his lawsuit machine.”

58. The Letter, stickers, and business cards were created and published by Gallini and Fields in furtherance of the conspiracy between them, as were the defamatory Wiki Pages linked within. The misrepresentations contained in these items were knowingly false and untrue, put Mr. Bryant in an unfavorable light, and were disseminated by Gallini and Fields with the intent to harm Mr. Bryant’s health and professional reputation.

59. This conspiracy and joint enterprise of defamation in which Gallini took part has been intentional, oppressive, and outrageous. It has been conducted with actual malice by Gallini and indicates Gallini’s callous disregard for the rights of Mr. Bryant.

60. The libelous statements created and disseminated by Gallini and Fields exposed Mr. Bryant to distrust, hatred, contempt, ridicule and embarrassment from his actual and prospective customers and his professional associates. They have thus damaged the reputation of Mr. Bryant in the estimation of his customers, prospects, and business associates, and they have interfered with the relationships between Plaintiffs and their customers, prospects, and business associates.

61. As a result, Mr. Bryant has been disparaged and has sustained damage to his professional reputation within the two-way radio community, in which he once maintained an excellent reputation and standing.

62. In addition, Gallini and Fields disseminated their defamatory materials with the intent that Motorola would terminate Mr. Bryant's radio dealership, and that Plaintiffs would lose their clients and professional associates and be unable to operate a successful radio dealership.

63. Gallini and Fields were able to convince Mr. Bryant's professional associates and clients that the defamatory publications were truthful. Based on this belief, Mr. Bryant's actual and prospective professional associates and clients considered terminating their relationships/agreement(s) with Mr. Bryant.

64. As of the filing of this Complaint, Plaintiffs continue to be damaged by Gallini's and Fields' defamatory publications, and by their wrongful interference with Plaintiffs contracts with radio professionals and prospective relationships with such professionals.

65. As a direct and proximate result of Gallini's and Fields' joint conduct, Plaintiffs have suffered actual damages.

66. Plaintiffs attempted repeatedly to resolve this matter with Gallini prior to filing this action; nevertheless, Gallini has repeatedly refused to accept accountability for his part in the conspiracy of defamation and pleads an inability to retract any defamatory publications.

V. CAUSES OF ACTION

A. DEFAMATION PER SE AND PER QUOD

67. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

68. Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, published numerous false statements to third parties. Specifically, the mailers that he created and / or disseminated in September 2023 included the defamatory Letter and the fraudulent business cards and stickers described above. These fraudulent business cards and stickers themselves included links to the defamatory Ken Bryant and Federal Agent Wiki pages.

69. The defamatory statements published and included within Gallini's September 2023 mailers accused Mr. Bryant of unethical sales conduct, misrepresented Plaintiffs' business licenses and practices, accused Mr. Bryant of criminal conduct, and disclosed sensitive information to the public that was expunged and vacated by Court order.

70. Gallini made these defamatory statements with the requisite degree of fault regarding their truth. Specifically, the statements Gallini made were knowingly false and intended to mislead their recipients. In other words, they were made with malice and a reckless and negligent disregard for their truth.

71. The statements harmed Plaintiffs' personal and professional reputations, and as a result, Plaintiffs seek to recover damages for the harm caused by Gallini's actions.

B. INVASION OF PRIVACY – INTRUSION ON SECLUSION

72. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

73. Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, intentionally intruded upon Mr. Bryant's solitude, seclusion, and private affairs and concerns. Specifically, Fields obtained Mr. Bryant's expunged and vacated court records from the file of an indicted and notorious hacker and shared private information from those documents on the Federal Agent Wiki page. Gallini distributed that Wiki page with the fraudulent business cards and stickers in May 2023, and again in September 2023.

74. These records were vacated and expunged by Court order, manifesting to the public that the matters contained within were not fit for public consumption but were instead entitled to privacy. Gallini's intrusion upon these matters was therefore highly offensive to Mr. Bryant and would be highly offensive to any reasonable person.

75. Gallini's intrusion upon these matters has caused injury to Mr. Bryant by harming his personal and professional reputations, interfering with his prospective and actual business relationships, and inflicting mental and emotional distress.

C. INVASION OF PRIVACY – PUBLIC DISCLOSURE OF EMBARRASSING PRIVATE FACTS

76. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

77. The same behavior giving rise to a claim for Invasion of Privacy – Intrusion on Seclusion, also supports a claim for Invasion of Privacy – Public Disclosure of Embarrassing Private Facts.

78. The vacated and expunged Court records disseminated by Gallini—via the Federal Agent Wiki page linked in the fraudulent business cards and stickers—contained intimate details about Mr. Bryant's personal life.

79. As explained above, the matters contained in these records were deemed by a Court to be highly sensitive, personal, and not of legitimate public concern.

80. Gallini's publication of these matters was therefore highly offensive to Mr. Bryant, as it would be to any reasonable person.

D. INVASION OF PRIVACY – WRONGFUL APPROPRIATION

81. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

82. Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, invaded Mr. Bryant's privacy by misappropriating his likeness. Specifically, the

defamatory stickers that Gallini and Fields created and published in May 2023, and again in September 2023, bore Mr. Bryant's name, unique radio call-sign, and photograph.

83. Gallini appropriated Mr. Bryant's name and likeness for the value associated with Mr. Bryant's identity.

84. Mr. Bryant is easily identifiable from the stickers, as Gallini intended.

85. Gallini and his conspiracy partner Fields benefitted from their misappropriation of Mr. Bryant's name and likeness because it provided them with a competitive advantage in the commercial radio market.

E. TORTIOUS INTERFERENCE WITH EXISTING CONTRACTS

86. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

87. At all relevant times, Mr. Bryant and Bryant Enterprises maintained contracts with customers for the sale of Motorola radios. Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, willfully and intentionally interfered with those contracts by publishing the defamatory statements about Mr. Bryant described above, including statements that impugned the quality of Mr. Bryant's goods and services, called into question Mr. Bryant's qualifications, and accused Mr. Bryant of criminal activity and overly-litigious behavior.

88. The interference of Gallini and Fields has caused Mr. Bryant and Bryant Enterprises to lose several existing customers with contracts to purchase radios, resulting in lost profits estimated to be over \$75,000.

F. TORTIOUS INTERFERENCE WITH PROSPECTIVE CONTRACTS

89. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

90. There is a reasonable probability that Mr. Bryant and Bryant Enterprises would have entered into business relationships with many entities for the sale of Motorola Radios.

91. Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, willfully and intentionally interfered with those contracts by publishing the defamatory statements about Mr. Bryant described above, including statements that impugned the quality of Mr. Bryant's goods and services, called into question Mr. Bryant's qualifications, and accused Mr. Bryant of criminal activity and overly-litigious behavior.

92. The interference of Gallini and Fields has caused Mr. Bryant and Bryant Enterprises to lose several potential customers and radio sales, resulting in lost profits estimated to be over \$75,000.

G. TRADEMARK INFRINGEMENT – COMMON LAW

93. Plaintiffs reassert and incorporate by reference all of the foregoing allegations.

94. For years, Plaintiffs have exclusively and continuously promoted and used the name North Georgia Communications and a logo, consisting of the words "North Georgia Communications" along with an image of triangular mountains adjacent to a lake within an oval, within the United States, including within the State of Texas. The DBA name North Georgia Communications and the logo have become a famous and well-known name and symbol of Plaintiffs and their products and were famous and well-known before the Gallini and Fields began creating and distributing items bearing this name and logo.

95. Plaintiffs have been using the trade name North Georgia Communications for more than ten years, and the sales from this business are nationwide and worldwide. The name "North Georgia Communications" and the logo have come to signify the quality and reputation of Plaintiffs' products and services. Plaintiffs' common law trademarks have acquired fame and distinctiveness and are associated in the mind of the public exclusively with Plaintiffs.

96. As described above, Gallini, in concert with Fields and in furtherance of their conspiracy and joint enterprise, disseminated fraudulent stickers and business cards bearing Plaintiffs' trade name and logo, causing recipients to believe that Plaintiffs generated and distributed these materials. These items also include designations that are identical with, or substantially indistinguishable from, Plaintiffs' trademarks. Gallini was aware of Plaintiffs' exclusive trademark rights at all relevant times, and he had direct and actual knowledge of Plaintiffs' prior use and ownership of the trade name "North Georgia Communications" and logo.

97. The infringing stickers and business cards described above are harmful to Plaintiffs' business reputations and relationships. Gallini has infringed upon Plaintiffs' trademarks, in part, to aid and give an unfair advantage to Plaintiffs' commercial competitors.

98. Gallini's infringements of Plaintiffs' common law trademarks by use in commerce are likely to cause confusion, deception, and mistake by creating the false and misleading impression that the infringing stickers and business cards were generated or distributed by Plaintiffs, or are associated or connected with Plaintiffs, or have the sponsorship, endorsement, or approval of Plaintiffs. Gallini's infringement has therefore caused, and will continue to cause, a likelihood of confusion in members of the trade and public, and injury to Plaintiffs' goodwill and reputation, for which Plaintiffs' have not adequate remedy at law.

99. Gallini's use of Plaintiffs' names and logo is confusingly similar or identical to Plaintiffs' marks. Gallini's infringements thus demonstrate an intentional, willful, and malicious intent to impair the goodwill associated with Plaintiffs' business name and logo and to cause Plaintiffs great and irreparable harm.

VI. DAMAGES

100. Defamation per se refers to statements that are so obviously harmful that general damages, such as mental anguish and loss of reputation, are presumed. *In re Lipsky*, 460 S.W.3d 579, 596 (Tex. 2015). Defamation per se includes accusing someone of a crime and making remarks that adversely reflect on one's fitness to conduct his business. *Id.* Several of Gallini's statements constitute defamation per se and do not require proof of damages.

101. In addition, several of Gallini's statements constitute defamation per quod. Since Gallini and Fields began their joint enterprise of defaming Mr. Bryant, he and his business have lost over \$75,000 in profits. Additionally, Mr. Bryant has sustained mental anguish and loss of reputation damages. Plaintiffs further seek recovery of exemplary damages because Gallini published the defamatory statements with actual malice.

102. Mr. Bryant seeks damages for the mental anguish resulting from the multiple invasions of his privacy committed by Gallini.

103. Mr. Bryant and Bryant Enterprises seek damages for the lost profits caused by Gallini's wrongful interference with actual and prospective contracts.

104. Mr. Bryant and Bryant Enterprises seek injunctive relief, lost profits, actual damages, enhanced profits and damages, and other damages and losses resulting from Gallini's infringement of their trademarks.

VII. CONDITIONS PRECEDENT

105. All conditions precedent to Plaintiffs' claims for relief have been performed or have occurred, specifically including but not limited to, tender of a retraction demand under TEX. CIV. PRAC. & REM. CODE § 73.055.

VIII. JURY DEMAND

106. Plaintiffs demand that this cause be placed upon the jury docket of this Court and thereafter be tried by jury according to FED. R. CIV. P. 38.

IX. PRAYER

For these reasons, Plaintiffs Ken Bryant and Bryant Enterprises, LLC respectfully request that the Court grant a full and final judgment in their favor and against Carsten Jason Gallini for all actual damages, pre-judgment and post-judgment interest at the highest rate allowed by law, injunctive relief, and all other relief to which they are justly entitled.

Respectfully submitted,

TERRAZAS PLLC
1001 S. Capital of Texas Hwy.
Bldg. L, Suite 250
Austin, Texas 78746
512.680.3257

By: /s/ Kevin J. Terrazas

Kevin J. Terrazas
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Attorneys for Plaintiffs

1. A SAMPLE OF BRIAN DONALD FIELDS' CYBERSMEAR CAMPAIGNS:

A. FRC

Regarding the FRC dispute, which occurred between an unknown date in 2015 to approximately July 6, 2017, Fields generally disputed with the board for “*operating outside of the Corporation’s legal boundaries.*” At www.frcreform.org, he **specifically named and doxed** the following board members’ information:

- Board of Directors (frcreform.org)
 - Glenn Mike Fletcher
 - Dana Rodakis
 - Chuck Lavender
 - Ralph Betts
 - Norman C. Scholer
 - Steve Lowman
 - Doug Stewart
 - Jame Deuel
 - Mark Filla
 - Joaquin A Pidal
 - Barry M. Isabelle

NOTE: According to <https://fasma.org/2017/07/>, “The FRC Reform caucus (<http://frcreform.org>) was started in 2015 by Bryan Fields W9CR.”

B. AllStarLink (ASL)

Regarding the AllStarLink dispute, which occurred between an unknown date and December 2019, Fields generally disputed with the board. In one of his comments located at https://community.allstarlink.org/t/allstarlink-quickly-moving-from_tampa/15770, he stated “*Pete, you and the rest of the AllStarLink board are by far, some of the most incompetent and devious fucks I’ve had the displeasure to know.*” It’s uncertain exactly who was part of the ASL board in 2019. However, according to the above link and the YouTube video reported below, it appears the following people were board members:

- Pete Elke (WI6H)
 - Board Member and ASL Admin
- Kevin Custer (W3KKC)
 - Board Member
- Tim Sawyer (WD6AWP)
 - Board Member and ASL Community Admin
- Todd Lesser (KM6RPT)
 - Board Member
- John David McGough (KB4FXC)

- Possible Board Member, according to YouTube video (www.youtube.com/watch?v=9ONwmEjN8VI)
- Steve Zingman
 - Possible Board Member, according to YouTube video (www.youtube.com/watch?v=9ONwmEjN8VI)

Fields also created a video titled “*Why I stopped supporting AllStarLink*” (35:39) located at www.youtube.com/watch?v=9ONwmEjN8VI. In it, he speaks about his split from ASL and **negatively speaks about specific people**, organizations, and companies, as follows:

- Generally insults AllStarLink
 - Cautions people against getting involved with ASL and donating to them
- Mentioned at least Steve Zingman, Kevin Custer, Todd Lesser, Pete Elke, Tim Sawyer by name
- Stated *John David McGough stole source code* and is a “*software pirate*”, 8:10
 - Spoke negatively about McGough’s company IntTek
- HAMVOIP, expletive-ridden rant, 20:25
- Mike (possibly Zingman, N4IRR) “absolute bull in a china shop, total idiot”, 28:40
 - Mike is probably relative of Steve Zingman

NOTE: John McGough and Todd Lesser also have Wiki pages created about them on www.wiki.w9cr.net, discussed further below.

C. ARDC

Regarding the ARDC dispute, which occurred between approximately mid-2019 to an unknown date, Fields did not amicably part ways with the organization when it sold one quarter of its IP space to Amazon. Although not necessarily maliciously, he did write in an email about then ARDC President Phil Karn (1st link), claimed guilt among all ARDC board members for selling IP space to Amazon, and made other disparaging remarks about ARDC (3rd link), as follows:

- <https://www.reddit.com/r/amateurradio/comments/cf2cbo/comment/eu7bz5q>
 - Comments about a message he received from ARDC President Phil Karn
- <https://mail.hamwan.org/pipermail/psdr/2020-June/002937.html>
- <https://lists.keekles.org/pipermail/44-reform/2019-September/000004.html>
 - He wrote “*ARDC has now given 110k to ARISS. I've asked ARISS if they condone ARDC by accepting this fraudulently obtained funding.*”

D. Other Disputes

Although already mentioned within the ASL dispute above, these people and organizations warrant mentioning as their own dispute due to Fields’ added emphasis about them, as follows:

- **HAMVOIP** – In the YouTube video listed above, at time 20:25, Fields includes an expletive-ridden rant about HAMVOIP, indicative of his animosity toward the organization.
 - Fields targeted HAMVOIP since at least December 8, 2019 when he mentioned the organization in the YouTube video listed above.
- **Todd Lesser** – Five Wiki pages are created about Todd Lesser at wiki.w9cr.net, discussed further below
- **John McGough** and his company IntTek – Two Wiki pages are created about John McGough at wiki.w9cr.net, discussed further below

2. CYBERSMEAR VICTIMS ESTIMATE

Below is an estimate of how many individuals Fields attacked based on the above-mentioned disputes:

- **FRC – 11 people**
- **ASL – 7 people**
- **ARDC – at least 1 person**
- **Organization / Company – FRC (dissolved); ASL, ARDC, HAMVOIP, and IntTek**

3. WIKI PAGES FIELDS CREATED OF INDIVIDUALS ATTACKED DURING CYBERSMEAR CAMPAIGNS

The following Wiki pages are on the wiki.w9cr.net website:

Ken Bryant

- https://wiki.w9cr.net/index.php/Ken_Bryant
- https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent

NOTE: Fields targeted Ken Bryant since June 2022 when Fields created Wiki pages dedicated to Bryant.

John David McGough

- https://wiki.w9cr.net/images/c/cf/HR_Timer_presentation.pdf
- https://wiki.w9cr.net/index.php/Dahdi_dummy

NOTE: Fields targeted John McGough since at least December 8, 2019 when Fields mentioned him in the above YouTube video and at least through December 30, 2022 when Fields updated McGough's Wiki page.

Todd Lesser

- https://wiki.w9cr.net/index.php/Todd_Lesser
- https://wiki.w9cr.net/index.php/Todd_Lesser_Businesses

- https://wiki.w9cr.net/index.php/Todd_Lesser_Other_Assets
- https://wiki.w9cr.net/index.php/Todd_Lesser_Property
- https://wiki.w9cr.net/index.php/Todd_Lesser_Social_Media

NOTE: Fields targeted Todd Lesser since at least December 8, 2019 when Fields mentioned him in the above YouTube video and at least through July 12, 2022 when Fields update one of Lesser's Wiki pages.

William (Billy) Klosowski

- https://wiki.w9cr.net/index.php/Billy_Klosowski

NOTE: According the Klosowski's Wiki page, Fields targeted William Klosowski since at least January 29, 2021 when Fields and Klosowski chatted online and at least through July 17, 2022 when Fields updated Klosowski's Wiki page.

SUMMARY OF BRYAN DONALD FIELDS' CYBERSMEAR "STICKER" CAMPAIGN:

Defendant Fields is a moderator of the private Facebook group “Motorola P25/TRBO/TETRA Users” where he created a Facebook post on May 8, 2022 about stickers he will send to any group member who requests them. According to the images, the stickers are cartoon depictions with peoples’ faces transposed onto them. (See image above.) Further, stickers are created for the purpose of defaming and demeaning people who Fields has ongoing disputes with.

It was Fields’ intention to demean, belittle, and ridicule people by creating a sticker campaign that overlays people’s faces onto cartoon characters’ bodies. The campaign included a request by Fields to (1) affix them in such a way that others could or would laugh at them and (2) “get pics back to us” (presumably as a form of self-gratification for Fields).

The aforementioned post contains and reveals the following information:

- A. Mr. Fields’ title in the private group is Admin and according to the image, he created the featured post on May 8, 2022.
- B. The image is a .pdf document created from a screen capture taken of the post and comments. Metadata associated with the .pdf document shows it was created on June 23, 2022. On that date, the private Facebook group maintained 5,900 members. Therefore, the post was presented to nearly 6,000 people in the group.
- C. Fields announced the sticker campaign by stating “Stickers? STICKERS! Stickers are here and free for the asking. We only want action shots when you use them. Bonus to anyone going to Hamvention, the best use/placement will get a prize.” He further stated “Post your ham callsign below, and optionally if you're going to Hamvention. We'll fill a USPS first class envelope with a stamp's worth and send

it to your FCC listed address. If you're not licensed, post your mailing address” and “All you have to do is get pics back to us.”

- D. The post includes an image which shows several stickers created with at least two people’s faces transposed over the cartoon image. The stickers are watermarked/branded with the fuckhams.com website, for which site Fields is at least a moderator, if not creator. The campaign is mirrored at <https://fuckhams.com/b/res/26.html>, also on May 8, 2022, and titled “Stickers? STICKERS!” The post states “Who wants stickers? Leave your call[sign] below and some will be sent to you[r] FCC address. It’s a random assortment of the one in the picture. Best action shot or hamfest placement wins a fuckhams gold subscription.” At the time, the fuckhams.com website already contained several negative comments about Mr. Bryant. Defendant Gallini as well as a colleague of Defendant Fields, who is a competitor of Plaintiff Bryant, had requested that Fields create a sticker depicting Mr. Bryant; it is unknown whether Defendant Fields created such a sticker pursuant to these requests.
- E. There were 152 comments made. Fields’ responses were part of the 152 comments as he responded to mostly everybody who commented, as follows:
1. 52 people responded with their callsign or address to be sent stickers
 2. Fields responded to most entries, except to one person who disagreed with the sticker campaign, Adam Isakson.
 3. Adam Isakson disagreed with the sticker campaign and commented twice, as follows: “It’s kinda ignorant to put someone’s company logo on a sticker to have distributed in a negative way. If it were my business we would have some serious issues” and “Send me all of them so I can throw the stickers in the trash.”
 4. 53 people reacted to the post with emojis, although the type of emoji is not visible
- F. Within the comment thread, Fields posted a photo showing a stack of envelopes ready for mailing. His comment stated “Ones for today’s mail. If you’re going to Dayton, clocks ticking on these!” His next comment was “First batch of 50 or so sent out today First Class USPS from 33701. We have lots more.”



Motorola P25/TRBO/TETRA Users

Private group · 6.9K members

Joined

Invite

Discussion

Featured

Topics

Your Items

Members

Media

Files

Questions



Bryan Fields

Admin · May 7 ·



Saturday fun 🎉





33

17 Comments

Like

Comment

Send

Top comments



Write a comment...

Ryan Owens [Admin](#) [Group expert](#)

Any chance that comes in a sticker?

[Like](#) [Reply](#) 17w

Mike McCurry

Awww too bad... wasn't he selling APX's to private individuals at contract prices.

[Like](#) [Reply](#) 18w

Pj Heck

Mike McCurry There was some person doing that, but then also having them touched by another, and then selling them is what I heard.

So legit radios became bastard radios with no depot warranty support.

[Like](#) [Reply](#) 18w

Erik Van Renselaar

Mike McCurry I thought contract prices were 15% above listed price? They sure seem to be for our system's contract (!)[Like](#) [Reply](#) 18w

Reply to Mike McCurry...

Matt Jackson
Elaborate?[Like](#) [Reply](#) 18wBilly Ray Harrison
please tell me this is who i think it is[Like](#) [Reply](#) 18wBryan Fields [Author](#) [Admin](#)**Billy Ray Harrison** the vp of Motorola channel partners.[Like](#) [Reply](#) 18w

Write a comment...



Motorola P25/TRBO/TETRA Users

Private group · 6.9K members

Joined

Invite



Carsten Gallini shared a link.

June 11 · 🌐

Seems the Batman of the radio world strikes again. I wonder when we will get a commemorative sticker?

https://wiki.w9cr.net/index.php/Ken_Bryant

https://wiki.w9cr.net/.../Ken_Bryant_Impersonation_of...



WIKI.W9CR.NET

Ken Bryant - W9CR

Ken Bryant /Bryant Enterprises, LLC/ D/B/A North Georgia Communications / DMR on Cloud hit me up on facebook messenger recently. He's also better known as K1DMR.

👍 🤔 😬 23

84 Comments

Like

Comment

Send

Top comments



Kyle Lucas

For some reason this looks like a obituary

Like Reply 13w



Carsten Gallini Author

Kyle Lucas



GIPHY

Like Reply 13w



Gary Taninbaum

Kyle Lucas I assure you I was FTF with him last Saturday.

Like Reply 13w



Michael Gerrity

Kyle Lucas I thought the same thing when I first pulled up the page.

Like Reply 13w



Matt DeHope

After reading this, it's definitely eye opening. I bought from him once in the past and wasn't impressed with the service part. For someone who is a channel partner, the service process should have been much smoother.

Like Reply 13w



Wanda Jonah Riner

I am new here & just joined but Ken has always been fair to me. I have bought several radios & repeaters from Ken. Most recently the ION & R7. I, also, saw him & spoke with him & Marla at the Atlanta Hamfest.

Like Reply 13w



Danny Soto

I've dealt with Ken in the past and have had no issues. He helped me quite a bit with programming. I'm not going going to knock on someone's past especially from almost 40 years ago as I've had my fair share of police run ins and arrests when I was ... See more

Like Reply 12w



Brian Betts

I've dealt with Ken several times and never had an issue with his service or pricing. I will use his services again in the future.

Like Reply 13w



Media

Files

Questions



Carsten Gallini [Author](#)

Brian Betts not saying don't. I find the whole situation funny. And some of the info is interesting. Figured might as well share it so folks can stay informed

Like Reply 13w



Rick Schafer

Brian Betts same with me. He always went out of his way to help.

Like Reply 13w



James Butterfield

Let's not forget the NCPRN lawsuit filed by Ken.

Like Reply 13w



Carsten Gallini [Author](#)

James Butterfield this, he lost access for breaking tos, today, part 97 by advertising his stuff for sale. It was deserved

Like Reply 13w



Timothy Eichelman

Explain to me why this is a issue ?? The man is a respected business man and to defame him like this is a atrocity

Like Reply 13w



Bryan Fields [Admin](#)

Timothy Eichelman it's not defamatory, I didn't know the guy until last week when he accused me via fb messenger of being someone who he had paid. The whole chat is there, you may read it for yourself.

I then researched him and published what I fou...

[See more](#)

Like Reply 13w



Timothy Eichelman

Bryan Fields i hear you but this sounds like a pissing match and a retaliation post thats all

Like Reply 13w



Matt DeHope

Okay just read the second article and gotta say, that's really disturbing. Definitely adds up considering the radio aspect to the case. I find it hard to believe that Motorola would allow him to be a channel partner let alone a dealer. I find it even h... [See more](#)

Like Reply 13w



Kenny Ray

Austin Read is this the ken that u told me never to buy an lon from since he keeps remote control of the units even after someone buys from him? He also claims to have the best prices lol

EXHIBIT 4



Carsten Gallini **Author**

Kenny Ray higher is better right?

Like Reply 13w



Kenny Ray

Carsten Gallini Ken Bryant is higher your motto?

Like Reply 13w



The comment Mikkel Aarup Hansen is replying to has been deleted.



Mikkel Aarup Hansen

Austin Read Posting a photo with peoples names and call signs seems very inappropriate.

Like Reply 13w



Kenny Ray

figured i would jump in here. I think i found the issue....California 🤔

<https://www.qrz.com/db/NR6E>



Like Reply 13w



Carsten Gallini **Author**

Kenny Ray rip

Like Reply 13w 🤔 3



Kenny Ray

Mikkel Aarup Hansen full disclosure, mine is wx4tcc and im on qrz, enjoy lol

Like Reply 13w

The comment Carsten Gallini is replying to has been deleted.



Carsten Gallini **Author**

■ Mikkel Aarup Hansen How so, its like if I went into radio ID or QRZ and posted a pic of the call sig list. Not much in his pic besides the fact that they have IONs

Like Reply 13w

■ 11 Replies



Gary Taninbaum

Kenny Ray Other Ion sellers do the same thing. My friend bought one from another reputable seller, & he's in the same boat. Remember, these radios are meant to be sold to a single entity, where only one person programs them all.

Like Reply 13w

EXHIBIT 4



Kevin Williams

I have purchased from John Betner and never had a problem.

I have purchased from Ken Bryant and never had a problem.... [See more](#)

Like Reply 13w



Carsten Gallini [Author](#)

Kevin Williams and nowhere here does it say don't. Its just information based on fact and other folks experience with him. And from other comments it doesn't seem to be an outlier

Like Reply 13w



Gary Taninbaum

Kevin Williams Same here. I have purchased from the same three, & never had a problem.

Like Reply 13w



Ira Friedman

Who's the two-face of the radio world then?

Like Reply 12w



Mike McCurry

Didnt he sue other hams to get on a closed repeater

Like Reply 13w



Alex Elmi [Admin](#) [Group expert](#)

Mike McCurry he got booted from NCPRN for using it as a regular part of his business, and then suing when his access was revoked.

NC court/judge was a dunce that didn't understand FCC laws and the entire process dragged out longer than it should. Ess... [See more](#)

Like Reply 13w



Mike McCurry

I heard Motorola revoked his dealership..

Like Reply 13w



Jim Housos

I wish Jeff Cherry was still around, He would have amazed to hear about the so called Mr nice guy Ken Bryant!

Like Reply 13w



Mascarpone Agroalimentare



EXHIBIT 4



Gary Taninbaum

Mascarpone Agroalimentare But I thought Depot can not be used on any APX with FW newer than 17. So how can an APX that's a few years old, or newer be programmed with Depot?

Like Reply 13w

8 Replies



Gary Taninbaum

I've known him since 1995. Bought a few radios from him back then, & a few about five years ago. Just bumped into him last Saturday at a ham fest in Alpharetta, Georgia. He always treated me right.

Like Reply 13w Edited



Felix F Ferrer Jr.

Gary Taninbaum amen Gary

Like Reply 13w



Carsten Gallini [Author](#)

Gary Taninbaum atleast with my experiences interacting with him my opinion on the matter is that he's a sue happy joke, with no people skills. Even before I seemly pissed him off he was not a pleasure to deal with.

Thats just my experiences with him,... [See more](#)

Like Reply 13w



Gary Taninbaum

Carsten Gallini Let me give you an example of people being pissed at him for no reason. A local wanted to buy a DMR mobile radio from him. He called up Ken, finalized a price, & reaffirmed the mobile radio was brand new. Ken assured him it was. So the ... [See more](#)

Like Reply 13w



Carsten Gallini [Author](#)

Gary Taninbaum oh yea, hams are eh, I've only got my license to play around with TETRA.

Like Reply 13w



Scotty William

Gary Taninbaum Alpharetta 🙏 my condolences for being there.

Like Reply 13w



Gary Taninbaum

Scotty William Well it was also an excuse to visit my brother who lives there.

Like Reply 13w



Scotty William

Gary Taninbaum that's a better reason lmao. I

EXHIBIT 4



Like Reply 13w



Gary Taninbaum

Scotty William Haven't seen him in a few years since his daughter's wedding. He was in the military for 20+ years. I'm on the right.



Like Reply 13w



Ira Friedman



Like Reply 13w



Matt DeHope



Like Reply 13w



Marco Torre

Jim Housos !

Like Reply 13w



Aaron Forsman

Ken Bryant ?????

Like Reply 13w





Bryan Fields [Admin](#)

so i didn't expect this to be posted here, but such is life. Until last week I've not had issue with **Ken Bryant**, but he messaged me out of the blue claiming that I worked for him and he was going to sue me. Upon speaking with others, I found it was a... [See more](#)

Like Reply 13w



Antonio Torch Kelly

This explains everything 🤔🤔🤔🤔🤔🤔🤔

Like Reply 13w



Main Page

W9CR info site

This is a small collection of stuff about hacking various radios. Right now it's mostly about the Quantar series of radios.

I expect to have some info on the AstroTac receiver and Comparators as well.

Contents

Radios/Electronics

Computers/Networking

Allstar

Todd Lesser

Documents and Standards

Miscellaneous

-
- Categories - A listing of all categories on this wiki
-

Radios/Electronics

- Information on the MTR2000 repeater I've messed with a while back. These are a "Quantar-lite", and kinda suck. I've recently added how to update them to the latest firmware.
- There is some information on the Uniden MRS904 repeater converting it for amateur use.
- Motorola Waris modifications and tech info. This covers the entire Waris line, HT/CDM/Pro/GP/GM/MTM700/EX/PR/CP
- Motorola R2001A/B/C/D communication service monitor information and manuals
- Hamtronics 220 repeater notes
- Telewave antenna patterns for radio mobile.
- XTS 2500 notes on programing for the 900 MHz Ham band.
- XTL Radio info on the XTL 2500/5000 mobile radios
- EF_Johnson some notes and programing info on the EF Johnson 5100 and 5300 radios
- Yaesu FT-51 Info on modification and service manual
- Kenwood Service Manuals - Kenwood service manuals I've scanned
- Kenwood Manual Category
- Yaesu Category
- Harris Falcon
- DMR IDs - Thoughts on the ham DMR ID fiasco.
- Trasnmitter Combiners - notes on transmitter combiners I've worked with and general theory.
- 2020 Ram 1500 Eco Diesel Radio Install - Work in progress about how I installed radios in my truck.
- BreezeACCESS FHSS radios - work in progress about how to repurpose the BreezeCOM/Alvarion BreezeACCESS II/900/V radios and convert the SU to AU. This was the top of the line wireless ISP gear circa 1998-2004.
- Astro Saber/XTS/Spectra category and notes

- [Motorola Saber Radio category](#)
- [Transmitter Fingerprinting](#) Info on various Transmitter Fingerprinting Implementations.

Computers/Networking

- [Cisco 3945 Notes on changing fans to be quieter](#)
- [HamWAN remote](#), a way to link into HamWAN Tampa via VPN using cheap routers.
- [Inmarsat Docs](#) Found online

Allstar

- [dahdi_dummy](#) for AllStarLink 1.01 and HamVoIP theft of code.
- [Information about the take over of AllStarLink, Inc.](#)

Todd Lesser

- Todd Lesser of San Diego, CA and his company North County Communication, Inc. is known to engage in fraudulent telecom billing via his sex chat lines. Has several judgements against him and and his companies in both [California](#) and [West Virginia](#).

Documents and Standards

- [R56 - Standards and Guidelines for Communication Sites](#)

Miscellaneous

- For the goons at [hamsexy](http://www.hamsexy.com) (<http://www.hamsexy.com>) which is apparently still alive and the APX/TRBO/TETRA users group (<https://www.facebook.com/groups/1544491192475817>) here's the [William Klosowski, K4SVT](#) drama.
- [TEOTWAWKI](#) - This might be useful for regular and irregular forces.
- [Ken Bryant, K1DMR](#) of North Georgia Communications doesn't want you to see this

-
- Total pages on this wiki: 3,013
 - Total articles on this wiki: 38
 - Total files on this wiki: 2,630
 - Total edits of this wiki: 8,810

[sitemap \(https://wiki.w9cr.net/sitemap.xml\)](https://wiki.w9cr.net/sitemap.xml)

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This page was last edited on 31 July 2022, at 21:10.

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Ken Bryant

Ken Bryant (<http://www.kenbryant.net/2.html>) /Bryant Enterprises, LLC (<http://www.firstresponder supply.com/>) / D/B/A North Georgia Communications (<https://northgeorgiacommunications.com/>) / DMR on Cloud (<https://dmroncloud.com/>) hit me up on facebook messenger recently. He's also known as K1DMR (<https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=3653425>), Ken Lawrence Bryant, K. Lawrence Bryant, Kenneth Lawrence Bryant.

Note the only interactions I've had with him was inquiring about the Motorola ION (https://www.motorolasolutions.com/en_us/products/two-way-radios/mototrbo/portable-radios/mototrbo-ion-radio.html) radio, which was overpriced from him and required me to use his radiocentral agency; I wanted my own agency so that I would have control over it. The other time was inquiring about his WAVE product, where he wouldn't discuss it unless via phone and provided no details on it, nor pricing.

I just assumed he was a bad salesman or at worst a guy trying to bottom feed in the amateur market since he can't hack it in the commercial market. Let's be honest, hams are a hard market to serve and no dealer is going to make much money selling one or two radios.

Fast Forward till June 4, 2022 and he sends me some messages about defaming him on some forum. He claims this harassment has "gotten to a point where it might affect your career."



Photo-of-ken-bryant

- **"I have paid you sales commissions and you have purchased from me going back several years"** - nope
- **"I am a Motorola channel partner, I own a Motorola dealership"** - rofl, like that's some big thing, sure ken
- **"I have plenty of canceled checks and invoices to you if you even scroll up in your own threads right here you will see previous messages about business transactions"** - nope, see below.

So Ken Bryant may be insane, and at least epitomizes the "Boomer Ham". He's got a poor grasp on technology and an even poorer grasp on human interaction. I suspect this is why I saw nothing on his WAVE solution as he can't code it, and lacks the technical prowess to hire it out.

Looks like he's an admitted whacker, radio pirate and former convicted felon too!.

"that's how the graham cracker crumbles"

Contents

Images from Facebook chat

Another Facebook Chain, Another person

Real Estate agent?

Further Research

Images from Facebook chat

Read theses top to bottom. This is insane!

**Ken Bryant**

Facebook

You're not friends on Facebook

29 mutual friends including Richard Rexroad and Garrett Gallo

1/26/21, 11:13 PM

Greetings, saw your post on the TRBO ion radio, what are you asking for one?

does it come with anything?



Please call me for pricing tomorrow. 828-389-5000

You can now message and call each other and see info like Active Status and when you've read messages.

Feb 22, 2022, 2:09 PM

Pm sent

So I have a system setup here and we have a tg just for us to play on

that's linked on wave



Hey call me this evening 828-389-5000

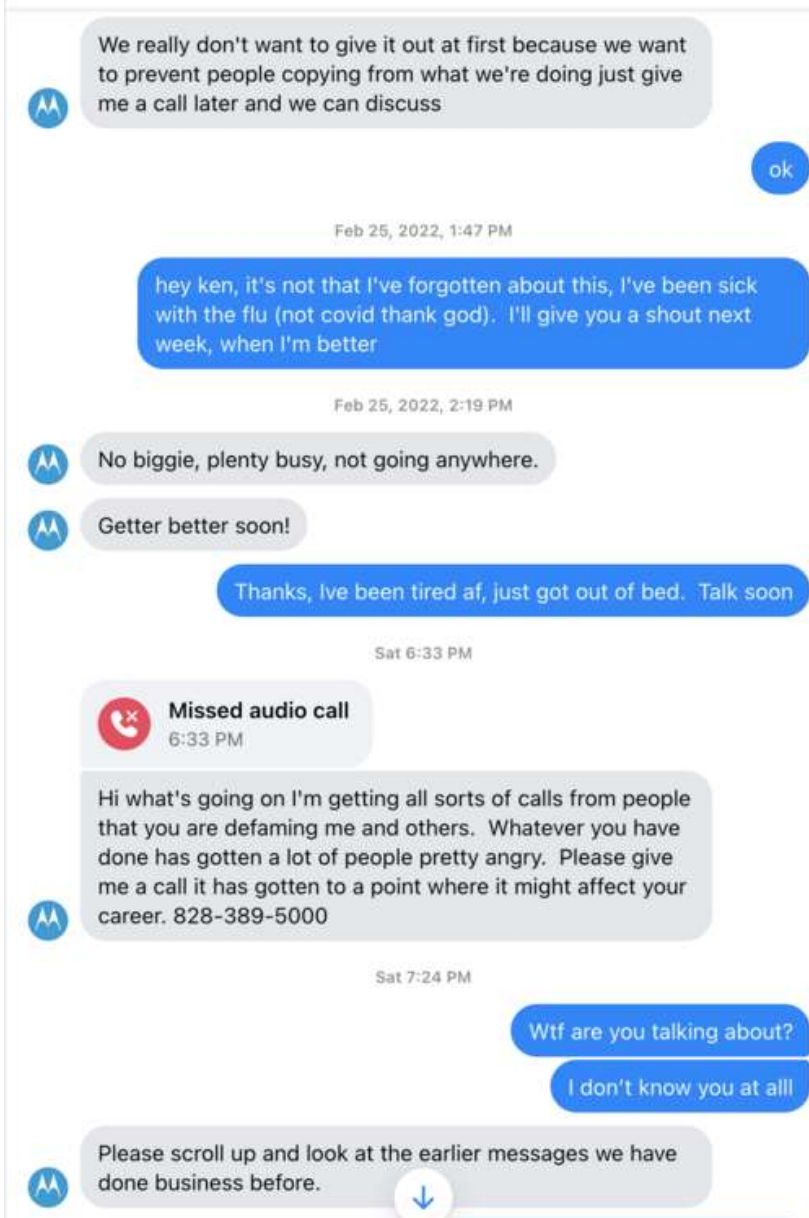
and we're using a diu to link that back to p25

you have any docs/etc. on your soultion?



We really don't want to give it out at first because we want to prevent people copying from what we're doing just give me a call later and we can dis







Please scroll up and look at the earlier messages we have done business before.

I've never done business with you

There is this site where allegedly you posted a bunch of stuff called fuckhams.com

**FUCK
HAMS**

Fuck Hams



Yes you have I have paid you sales commissions and you have purchased from me going back several years

What exactly do you have an issue with?



I just sent you the website where the posts were

It's a website

What specifically are you referring to?

You've paid me? For what services?



As far as I'm concerned it is defamation others have other concerns.

Again, I'm asking what specifically you're referring to

You're just some ham from Facebook afik



I'm talking about the defamation that occurred to me and



I'm talking about the defamation that occurred to me and my business that apparently was posted by you on that website

Afaik

I am a Motorola channel partner



I own a Motorola dealership



You replied to Ken

Yes you have I have paid you sales commissions and you have purchased fr...

Do you have any proof of this? I would love to see a check or invoice from myself to you



Sure, I have plenty of canceled checks and invoices to you if you even scroll up in your own threads right here you will see previous messages about business transactions



I don't see anything



Just scroll up



There's nothing there



Last time we communicated was February 25th

So send me some

Yes I'll email it to you, I find it kind of hard to believe you don't know who I am



Did you not post the above?

Nope



Okay a couple people are saying that you did but we'll track it back

I want to see what business you say you've done with me



Man if you can remember I don't know what to tell you



I think you're full of shit

And lying

Seems like a simple request

Since you're claiming to have paid me

Someone asks me for that proof, I can provide it as an Invoice/PO or canceled



Like simple shit

So put up, or quit running your channel partner mouth about it

Well maybe you or somebody else the same name. If you didn't publish that or have anything to the website then you've got nothing to worry about.

There's no reason to start cussing and using foul language

I'm driving a car at the moment if you don't mind

You are the one who said to scroll up, meaning that you know this is the right person, and that you are saying the proof is in the chat

I don't see it

Again as I said I'm driving a car if it's in my history I don't know why it's not in yours I can obviously screenshot it and send it to you when I get a chance send me your email I'll be happy to send it to you

So if you've got a cancel check, or invoice, show me some proof

Again as I said I will check my records it might be another person with your same name

Please send me what "proof" you have when your parked.

You're just some random boomer ham running his mouth otherwise

The Brian Fields that I know and have done business with used to work for bearcom in Texas, so again maybe it's somebody with the same name

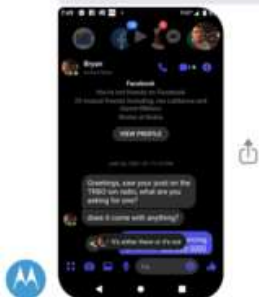
↓
en, if it's in the chat, you can see it

Ken, if it's in the chat, you can see it

I can't

It's either there or it's not

Here is one of the screenshots in my history from you



You replied to Ken

There's no reason to start cussing and using foul language

Calling a spade a spade isn't foul language

You replied to Ken



Yep, same top of the chat i see

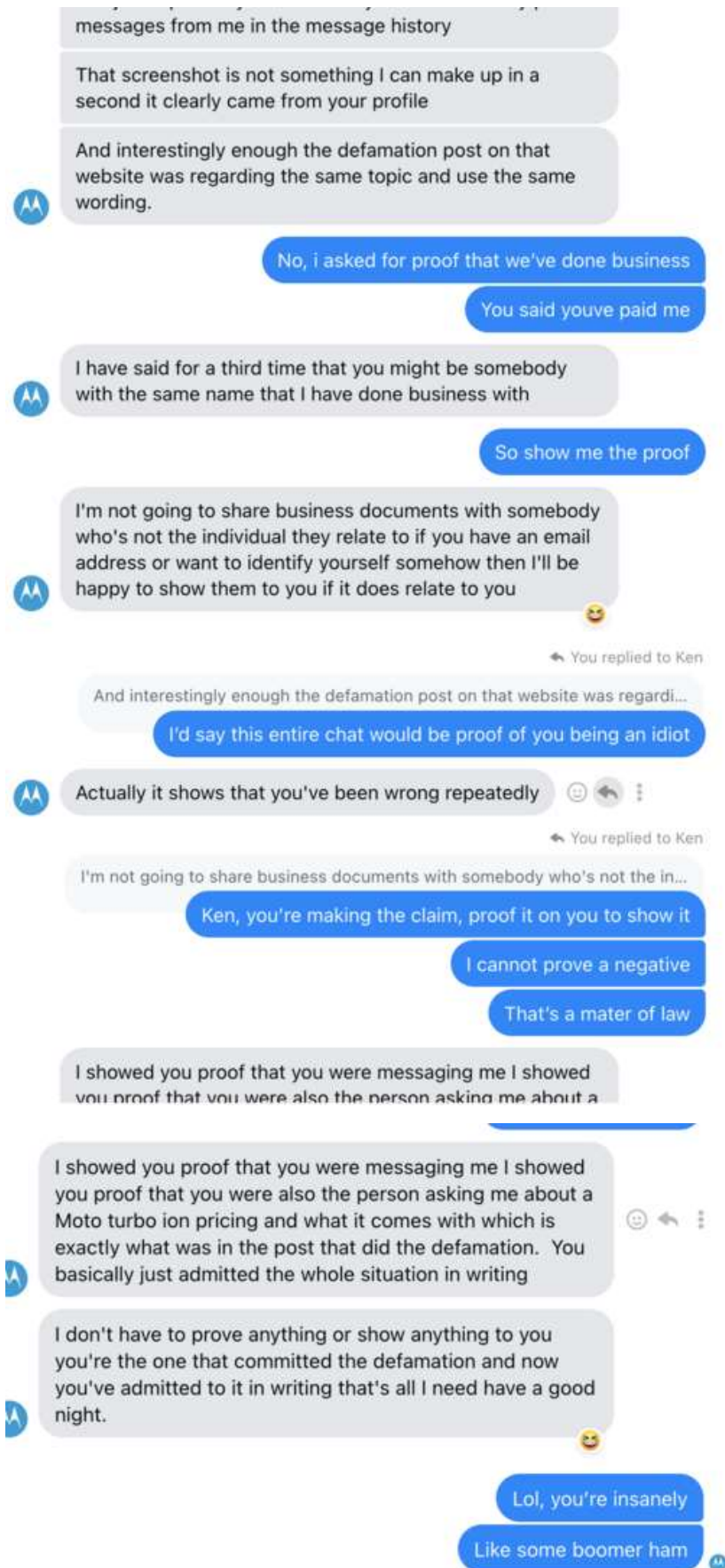
I just sent you proof from your own message profile that you are messaging me in January 2021 so who is the Spade



It's not there

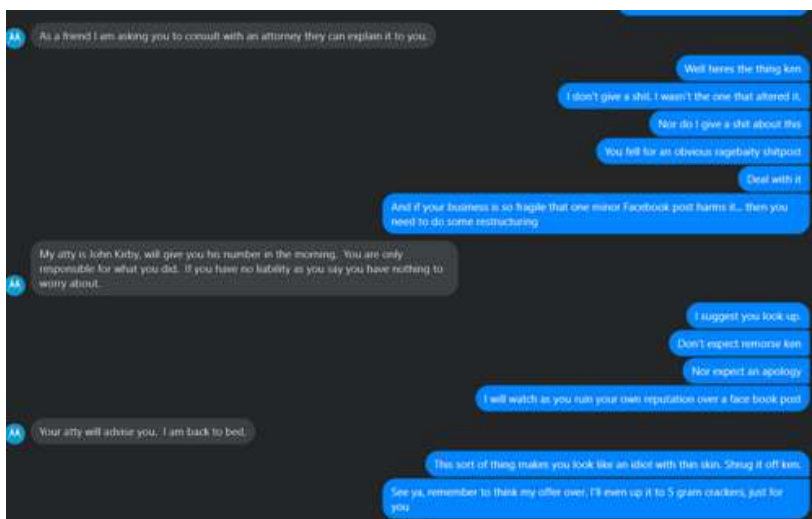
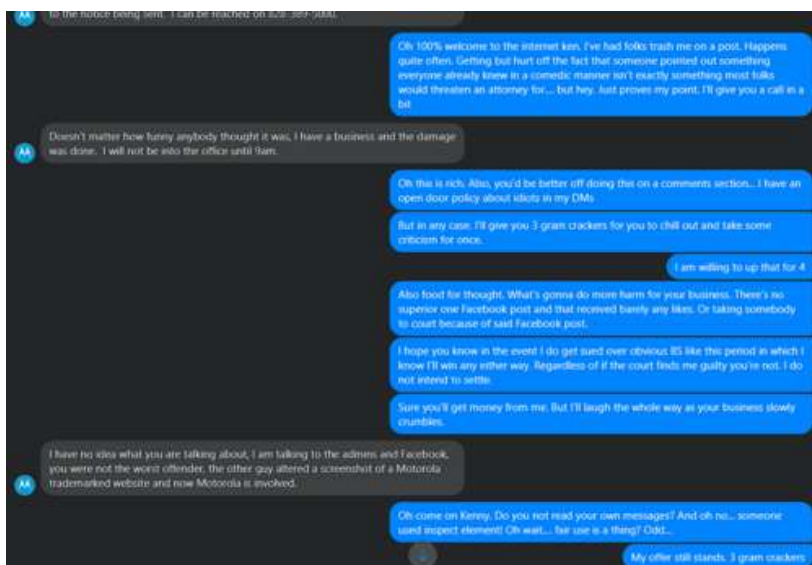
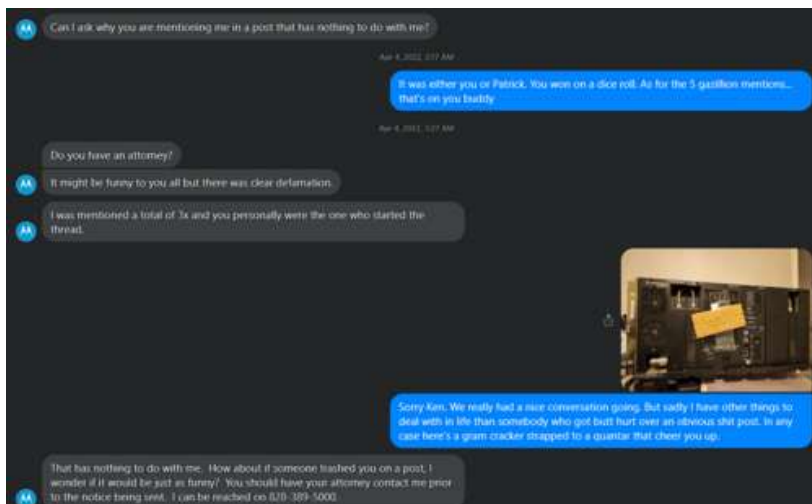
You just repeatedly told me that you never saw any prior messages from me in the message history

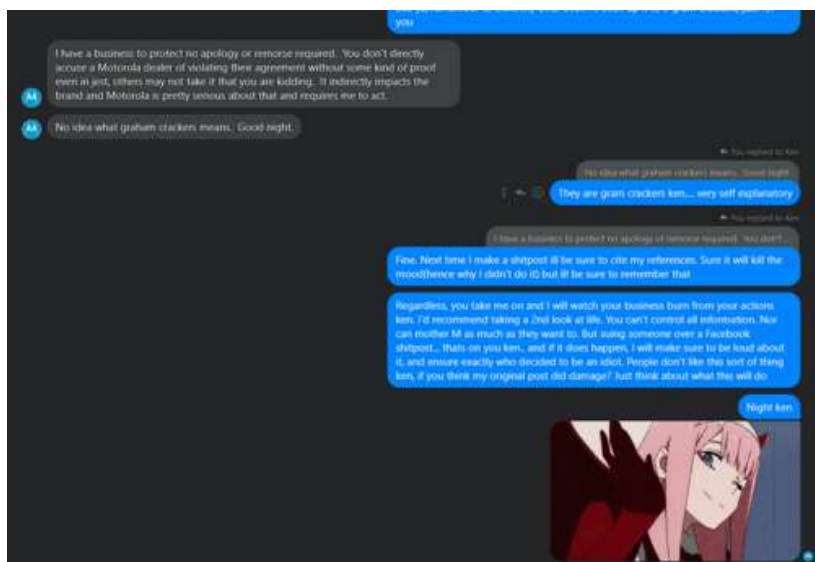
That screenshot is not something I can make up in a second it clearly came from your profile



Another Facebook Chain, Another person

Yall Like crazy? Read these top to bottom





For context, this was in response to what we in the business call a "Shitpost (<https://www.urbandictionary.com/define.php?term=Shitpost>)" that could be found here (<https://facebook.com/groups/1544491192475817/permalink/3122094558048798/>) where the only references the involved made to Ken were some quips about ken selling "quality" radios", and "deserves the honest dealer of the year award"

-Rosesam

Real Estate agent?

Apparently he's a scummy realtor too.

<http://kenbryant.info/>

<http://www.ncmountainsandlakes.com/>

<http://www.gamountainsandlakes.net/>

Further Research

After some other people reached out regarding disturbing comments regarding Ken Bryant, I did a bit of digging in his background. Ken claims to have several degrees, and multiple graduate level degrees as well on his QRZ page (<https://www.qrz.com/db/K1DMR>)^[1]. What's curious is the voice moving from first person to third and back again in this. I then saw his notice

"Presidential Staff member for planning and logistics to the White House Advance during the Reagan, Bush and Clinton Administrations"

"I possess a Master of Science Degree in Criminal Justice, **summa cum laude**"

The staff member during the Regan - Clinton administrations would mean he worked at some point from 1981-2001 for the white house for 14 years. I thought Ken was in his late 40's or early 50's, so this would mean he was very young, even if we take the last year of Regan (1989) to the first year of Clinton (1993) to be working in such a position. It's not impossible.

Note that in most colleges in the US and Europe summa cum laude/Latin honors are only awarded to under graduate degrees (https://en.wikipedia.org/wiki/Latin_honors#Distinctions). ~~This doesn't mean it's not true, I can be wrong.~~ See below.

Update 2022-06-13, I reached out to the Sr. Program Coordinator of the Department of Criminology & Criminal Justice at FIU (<https://ccj.fiu.edu/>). He responded:

Hi Bryan,

I just checked the transcripts of a few of my students who have graduated with their Masters in Criminal Justice degrees and their degrees are not posted with Latin Honors. Their Bachelors degrees are.

This means at minimum that Ken doesn't have Latin honors on his "masters degree" and perhaps lacks the degree all together.

The wording of this landed me to his link to <http://amlcft.com/about/> (<https://web.archive.org/web/20150221211337/http://amlcft.com:80/about/>) which is a business he purported to run for anti-money laundering consulting. On this page, there were document numbers for name registrations with the Florida Dept. of State, aka sunbiz.org. GO2107900163^[2] found him to be using the name "K. Lawrence Bryant" circa 1999.

As Ken has stated he is "Former Federal Agent, U.S. Department of the Treasury" it's likely he will be in PACER (<https://pacer.uscourts.gov/>). All federal agents will be giving testimony or writing other things that show up in the courts, and one would expect him to have done so. The only thing I would find was a criminal case 4-726-Cr-EATON. This seemed strange, but there was no info in PACER for this. We're lucky that at one time PACER was almost indexed by Aaron Swartz (https://en.wikipedia.org/wiki/Aaron_Swartz#PACER), and his archive has these important documents. I'd encourage you to read more about Aaron if you've never heard of him.

As it turns out, at age 20/21 Ken was impersonating a federal agent what would have been his junior or senior year of his under grad at FIU!

This is all starting to make sense. Why would a person who's an expert in anti-money laundering ask for hams to pay him in violation of PayPal and bank policies?

From Ken Bryant <email@kenbryant.net> ★
 Subject: IONs have ARRIVED
 To: bryan@bryanfields.net <bryan@bryanfields.net> ★
 Cc: Marla Kephart <marla@northgeorgiacommunications.com> ☆
 DKIM Valid (Signed by kenbryant.onmicrosoft.com) 📧

3/4/21, 10:10 PM

Credit Card - (we send you a link to a secure site to pay online and we pay up to 1% on your behalf)

Credit Card - Personal VISA/MC/DISC 2%

Credit Card - Corporate or Rewards 3%

Credit Card - AMEX 3.5%

Credit Card - Int'l 4%

Paypal Invoice - Domestic 3%/International 4.5% (we will send an invoice paypal request after you approve the draft invoice)

Paypal Friends & Family NO FEE (must have a connected bank account or paypal balance, specifically make sure the default GOODS AND SERVICES is not selected, and DO NOT MAKE ANY BUSINESS RELATED COMMENTS IN THE NOTES)

Purchase Order - NO FEE (for qualified government entities and businesses)

Pop Money/Bill Pay - NO FEE

Check by Phone - NO FEE

Bank Transfer or ACH - NO FEE (we can also initiate to you with a picture of your check)

Bank/Cashier's Check/Money Order - NO FEE (you can send a picture of the check with tracking and it will not delay your order)

Wire Transfer - (\$15 incoming fee, must be in USD and all sending fees prepaid)

Personal Checks - NO FEE (but will take 7-10 days to clear)

I was concerned this may not be him, but was able to look at his FCC call sign page in ULS, K1DMR (<https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=3653425>). This referenced his old call, KF4CZB (<https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=568686>). Now ULS only goes to about 2002 or so, so into the historical QRZ from November 1995, which found his Miami address and Birthday.

KF4CZB KENNETH L BRYANT
 8250 NW 191 ST E
 MIAMI, FL 33015

Born: 12/18/63
 Licn: 8/30/95 T
 Expn: 8/30/05

QRZ 6.0 11/95
File Edit Lookup History Options Help

KF4CZB KENNETH L BRYANT
8250 NW 191 ST E
MIAMI, FL 33015
Technician: 8/30/95
Expires: 8/30/05 Born: 12/18/63

Callsign KF4CZB Search Count
Next Continue
Callsign Search 1 Clear Favt Log
Card Quick Print

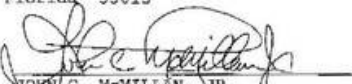
KF4CZB KENNETH L BRYANT
8250 NW 191 ST E
MIAMI, FL 33015
Born: 12/18/63
Licn: 8/30/95 T
Expn: 8/30/05

This DOB and Address matches filings he made pro-se in his criminal case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Government's Response to Defendant's Pro Se Motion to Expunge the Clerk of Court's Files and Records was mailed this 21st day of November, 1996, to:

Mr. Kenneth L. Bryant
8250 NW 191 St
Suite E
Miami, Florida 33015


JOHN C. McMILLAN, JR.
ASSISTANT UNITED STATES ATTORNEY

7

Now we know he was born in 1963, making him 18 when Regan was sworn in, which is a bit young for a White House advance team agent. In 1985 we can confirm he was on Federal Probation as a youthful offender, so this is not likely and he was not off probation until 1988. This would make his stated 14 years of service highly improbable. He stated in his filing to seal the court records in 1996 that he was unable to get a job as a federal law enforcement officer. This would make his claims even harder to believe.

Upon closer inspection, most of what he's listed on his resume is nothing more than volunteer positions. CERT, ARES Emergency Coordinator, U.S. Coast Guard Auxiliary, Emergency Management Institute, FCC License holder, etc. Some are simply hard to believe, such as his claim of being a Founding Member of the U.S. Department of Homeland Security. If anything I'd ask why a person with all these qualification, multiple graduate degrees, and business experience is working as a commercial two-way dealer; it doesn't add up.

I'd encourage everyone to review his federal conviction and case files. The finding of the psychiatrist who evaluated him was

"[Ken's] sense of reality might. be impaired and that [he] suffered from a possible psychosis."

and

has "a possible personality disorder and a fantasy life which is: **"CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE."**

Based on my limited interaction with him, I think he may in need of further help.

1. Archive.org link (<https://web.archive.org/web/20220611011744/https://www.qrz.com/db/K1DMR>)
2. Sunbiz link for this (<http://dos.sunbiz.org/scripts/ficevent.exe?docnum=G99084900060#>)

Retrieved from "https://wiki.w9cr.net/index.php?title=Ken_Bryant&oldid=7181"

This page was last edited on 14 June 2022, at 15:15.

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Ken Bryant Impersonation of Federal Agent

Ken Bryant Impersonation of Federal Agent Case 4-726-Cr-EATON

After some other people reached out regarding disturbing comments regarding Ken Bryant, I did a bit of digging in his background. Ken claims to have several Degrees on his Linked in (<https://www.linkedin.com/in/kennethlbryant/>)^[1] and on his old about page on [amlcft.com/about](https://web.archive.org/web/20150221211337/http://amlcft.com:80/about/) (<https://web.archive.org/web/20150221211337/http://amlcft.com:80/about/>). After looking into PACER for him it was found that he was indicted in Federal Court for impersonating a federal law enforcement officer, and alleged radio interface in June 1984.

Contents

Filings

- Indictment
- Federal Warrant
- Booking Information Sheet
- Response to Discovery
- Psychiatric Evaluation continuance
- Plea agreement
- Judgement Order
- Vacation of Conviction

Ken's attempt to seal the conviction

Filings

Not all the filings were able to be found, as reflected in the

Indictment

Here's a copy of the indictment

During a conversation on or about June 11, 1984 defendant told the above-described FIU police officer that he was attempting to serve a federal warrant for obstruction of justice on an FIU student (hereinafter "the FIU student"). Defendant asked the police officer to observe the comings and goings of the FIU student in order to assist the Defendant in serving this warrant for obstruction of justice. Defendant also gave the FIU police officer an auto tag number, which auto tag was registered in the same name as the person whom defendant identified as the FIU student on whom he (defendant) stated he was seeking to serve the warrant.

the defendant, on or about the date listed above, did knowingly and willfully, transmit his voice over a radio frequency utilized by the Miami, Florida office of the Federal Bureau of Investigation and therein identified himself as "KB" , signal "3-8-9-6-5" and stated there was a systems "intrusion";

RML:mt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDANO. **84-0726CR-EATON**
18 USC 912
47 USC 301 and 501

UNITED STATES OF AMERICA

v.

INDICTMENTKENNETH LAWRENCE BRYANT

The Grand Jury charges that:

COUNT I

Between on or about June 1, 1984 and June 11, 1984, in Dade County, in the Southern District of Florida, the defendant,

KENNETH LAWRENCE BRYANT,

did knowingly and willfully falsely assume and pretend to be an officer and employee acting under the authority of the United States and a department and agency, thereof, to wit: a special agent for the Federal Government, and did act as such, in that, among other things, in Dade County, in the Southern District of Florida:

1. Between on or about June 1, 1984 and June 11, 1984, the defendant falsely told a Florida International University (FIU) state university police officer that he (Defendant) was a special agent of the federal government and that he was working out of the FBI office in Miami.

Federal Warrant

In this next we can see the Federal Warrant where he is charged with Falsely impersonating a special agent of the United States Department of Justice.

MAGISTRATE INFORMATION FORM

NAME OF DEFENDANT: KENNETH LAWRENCE BRYANT

OFFENSE(S) CHARGE: Impersonation Federal Agent

TYPE OF CHARGING DOCUMENT: (CHECK ONE)

☐ INDICTMENT ☒ COMPLAINT

☐ BENCH WARRANT FOR FAILURE TO APPEAR

☐ PROBATION VIOLATION WARRANT

☐ PAROLE VIOLATION WARRANT

COPY OF WARRANT LEFT WITH BOOKING OFFICER

☒ YES ☐ NO

AMOUNT OF BOND: To be set

WHO SET BOND: _____

DISTRICT WHERE CASE PENDING: SDF

CASE NUMBER: 84-3706 CHS

ARRESTING OFFICER: MacClary / COSTA
(PRINT)

AGENCY: FBI - MIAMI

OFFICE PHONE: 573-3333

Note on page 8 you can see the phony document where Ken States he's a special agent with the "Organized Crime Strike Force"

United States Department of Justice
Organized Crime and Racketeering
Organized Crime Strike Force
Kenneth L. Bryant
Special Agent
Miami Field Office
3801 Biscayne Blvd.
Miami, FL 33137

June 4, 1984

State of Florida
Department of Law Enforcement
Criminal Investigation Division
Miami Operations Center
Earnest Neal
Special Agent
401 N.W. 2nd Avenue
Miami, FL 33128

Dear Sir;

The following attachment (2 of 2), refers to the audio visual rental of one (1) sixteen (16) millimeter (mm) film projector for a single (one) day (twenty-four (24) hour period).

I was advised by an industrial source that "there is no such thing as an 8mm projector." Further information provided was that the 16mm film projector is the standard particular to the film market industry. Please be sure and verify that your film Blood on the Mountain is of the 16mm variety. Advise if there is any deviation from the above mentioned presumption.

Respectfully submitted in all sincerity,

Kenneth L. Bryant

Kenneth L. Bryant
Department of Justice
U.S. Special Agent

EN:klb, Encl. A 2a
dw for klb DOJ/OCR

Ex. "A" (p. 1 of 2)

Booking Information Sheet

In this we can see the DOB, name and general description is a likely match for Ken. The officer noted "Possible mental condition" as well.

United States Department of Justice
United States Marshal
Southern District of Florida
Miami, Florida 33101

PLEASE PRINT BOOKING INFORMATION SHEET PLEASE PRINT

AGENCY: FBI OFFICER: MacClary

NAME: BRYANT KENNETH L. A/K/A
Last, first middle

RACE: W SEX: M HGT: 6'3" WGT: 185 HAIR: Bm EYE: Grey DOB: redacted

POB: MIAMI, FLA Dade ADDRESS:
city, state, country

CITY: STATE: SSN:

FBI#: ARREST BASED ON, WARRANT: 84-3206-CHS
check warrant number

PROBABLE CAUSE: T 18 § 912 DISTRICT WARRANT ISSUED
check title and section

CHARGE (S): Impersonation Federal Agent

DATE, TIME AND PLACE OF ARREST: 10/12/84, 9:20 AM, Hialeah, FLA

MAGISTRATE TO APPEAR BEFORE: USM SORRENTINO

AUTHORIZING A.U.S.A.: BOB WIPMAN
for probable cause arrest, name and office phone number

KNOWN MEDICAL PROBLEMS: identity

ESCAPE RISK OR POTENTIAL: Possible mental condition

DATE AND TIME OF BOOKING: 10/12/84 11:15 AM

ARRESTING OFFICERS SIGNATURE: Richard M. MacClary

This completed form is to be attached to the fingerprint card (s) and photographs and left for the U.S. Marshals to pick up.

Response to Discovery

In this there is a description of the evidence the feds have on him.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 4-726-Cr-EATON

UNITED STATES OF AMERICA
v.
KENNETH BRYANT

GOVERNMENT RESPONSE TO STANDING DISCOVERY ORDER

Pursuant to the Standing Discovery Order issued in the above-captioned case, the following is attached hereto:
Discovery Letter No. 1

Respectfully submitted,
STANLEY MARCUS
UNITED STATES ATTORNEY

BY: [Signature]
ROBERT M. LIPMAN
ASSISTANT UNITED STATES ATTORNEY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this response was mailed this 5th day of December, 1984, to persons listed on the attached letter.

[Signature]
ROBERT M. LIPMAN
ASSISTANT UNITED STATES ATTORNEY

12/6	12/6	HL
1	10 STARS	COMPLETED BY

Of the most interesting evidence claims by the Feds:

- recording of Ken Bryant speaking over City of Miami Police frequency
- statements over FBI radio
- claiming to be a Federal Agent to Secret Service employee John Allen
- Claims to FIU Police Officer Bustamante, Florida State Investigator Edward Wallace, Detective Osmond Austin, and DEA Special Agent Kenneth Goodman
- application for private investigator's license

Psychiatric Evaluation continuance

In this we his attorney (the federal public defender) move to have him evaluated by a psychiatrist. This is not uncommon in these cases, but the summary is interesting to read. Ken may suffer from the same problems still.

Defendant was psychiatricly evaluated by Dr. Adolfo Vilasuso, psychiatrist. Dr. Vilasuso's preliminary findings indicated, among other items, that Defendant's sense of reality might be impaired and that Defendant suffered from a possible psychosis.

On December 27, 1984, Dr. Lloyd Miller, Forensic Psychiatrist, examined Defendant and filed a report which reflected

a possible personality disorder and a fantasy life which is: "**CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE.**"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 84-726-Cr-JUDGE BATON

UNITED STATES OF AMERICA :

VS. :

KENNETH BRYANT :

MOTION FOR CONTINUENCE OF TRIAL
FOR PURPOSES OF SECURING ADDITIONAL PSYCHIATRIC EVALUATIONS

The Defendant, Kenneth Bryant, through counsel, moves that a continuance of trial be granted in order to allow sufficient time for additional psychiatric evaluations to be performed. As grounds therefor, Defendant states:

1. On or about November 28, 1984, Defendant was psychiatrically evaluated by Dr. Adolfo Vilasuso, Psychiatrist. Dr. Vilasuso's preliminary findings indicated, among other items, that Defendant's sense of reality might be impaired and that Defendant suffered from a possible psychosis.
2. On December 27, 1984, Dr. Lloyd Miller, Forensic Psychiatrist, examined Defendant and filed a report which reflected a possible personality disorder and a fantasy life which is: "CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE." (emphasis supplied)

Dr. Miller concluded that Defendant is not competent to stand trial despite his findings, including the fact that he learned that

RECEIVED BY
10 118 1-8

Plea agreement

RML:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 84-726-Cr-Eaton

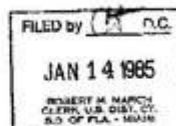
UNITED STATES OF AMERICA,

Plaintiff,

v.

Kenneth Bryant

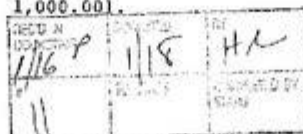
Defendant.

PRE-PLEA AGREEMENT

The United States and Kenneth Bryant

(hereinafter referred to as the "defendant") enter into the following Agreement:

1. The defendant agrees to plead guilty to Count 1 of the Indictment, which count charges the defendant with, in substance, falsely impersonating a special agent of the federal government and acting as such, in violation of Title 18, U.S.C., Sec. 912.
2. The United States agrees to dismiss the remainder of the Indictment, with respect to this defendant, after sentencing.
3. The defendant understands and agrees that the Court may impose any sentence authorized by law and that the defendant may not withdraw his plea solely as a result of the sentence imposed. In other words, the defendant understands and agrees that the Court may sentence the defendant up to three (3) years imprisonment and fine the defendant up to one thousand dollars (\$ 1,000.00).



[Handwritten signatures and initials]

Ken Bryant, **plead guilty Jan 14 1985**, and he was 22. As this happened when he was 21, he was sentenced as a youth offender, and would be able to have the conviction vacated when he was off probation. (assuming he didn't re-offend).

Judgement Order

United States of America vs. **KENNETH LAWRENCE BRYANT**
DEFENDANT **548 West 53rd Street**
St. Petersburg, Florida DOCKET NO. **84-726-Cr-EATON**

United States District Court for
SOUTHERN DISTRICT OF FLORIDA

JUDGMENT AND PROBATION/COMMITMENT ORDER (U.S. DIST. CT. - MIAMI)

In the presence of the attorney for the government the defendant appeared in person on this date **February 21, 1985**

COUNSEL
☐ WITHOUT COUNSEL However, the court advised defendant of right to counsel and asked whether defendant desired to have counsel appointed by the court and the defendant thereupon waived assistance of counsel.
☒ WITH COUNSEL **Stewart Abrams, AFPD**
 (Name of Counsel)

PLEA
☒ GUILTY, and the court being satisfied that there is a factual basis for the plea, ☐ NOLO CONTENDERE, ☐ NOT GUILTY

FINDING & JUDGMENT
 There being a finding/verdict of ☐ NOT GUILTY. Defendant is discharged. ☒ GUILTY.
 Defendant has been convicted as charged of the offense(s) of **falsely impersonating a special agent of the federal government and acting as such, in violation of Title 18, U.S. Code, §912, as charged in Count I of the Indictment.**

SENTENCE OR PROBATION ORDER
 The court asked whether defendant had anything to say why judgment should not be pronounced. Because no sufficient cause to the contrary was shown, or appeared to the court, the court adjudged the defendant guilty as charged and convicted and ordered that: The defendant is hereby committed to the custody of the Attorney General or his authorized representative for imprisonment for a period of
Imposition of sentence of confinement be withheld and, pursuant to Title 18, U.S. Code, §5010(a) of the Federal Youth Corrections Act the defendant be placed on probation. It is further ORDERED AND ADJUDGED as special condition of parole, the deft is to get counseling and not be allowed to possess a gun.

SPECIAL CONDITIONS OF PROBATION

ADDITIONAL CONDITIONS OF PROBATION
 In addition to the special conditions of probation imposed above, it is hereby ordered that the general conditions of probation set out on the reverse side of this judgment be imposed. The Court may change the conditions of probation, reduce or extend the period of probation, and at any time during the probation period or within a maximum probation period of five years permitted by law, may issue a warrant and revoke probation for a violation occurring during the probation period.

COMMITMENT RECOMMENDATION
 The court orders commitment to the custody of the Attorney General and recommends:
 MAR 1 1985

MONITOR BY
☒ U.S. District Judge
☐ U.S. Magistrate

JOE EATON Date **Feb. 27, 1985**

It is ordered that the Clerk deliver a certified copy of this judgment and commitment to the U.S. Marshal who shall deliver it to the defendant.

2/28 3/1 15 3/1 3/4

Ken was sentenced to only probation and was prohibited from possessing a gun.

Vacation of Conviction

PROB 34
(Rev. 2/79)

State of Vacation of Conviction

United States District Court

FOR THE
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA
v.
Kenneth BRYANT

No. 84-726-Cr-RYSKAMP

This is to certify that on September 4, 19 87,
this Court discharged Kenneth Bryant from
probation prior to the expiration of the maximum period of his probation and therefore the judg-
ment of conviction entered on February 21, 1985, in United States v.
Kenneth Bryant, No. 84-726-, has been set aside pursuant to the provi-
sions of Section 5021 (b), Title 18, U.S. Code.

September 4, 19 87.

KENNETH L. RYSKAMP
Judge

Certified to be true and
correct copy of the original
Robert M. March, Clerk
U.S. District Court
Southern District of Florida
By [Signature] Deputy Clerk
Date SEP 17 1987

20-3614-11718

Ken was able to get his probation ended early in September 1987 and since he "kept his nose clean" as a youthful offender the conviction was set aside. He no longer had to answer he was a convicted federal felon.

Ken's attempt to seal the conviction

In 1996 (when he would be 32/33) Ken wanted the case files shredded. It would appear he was not successful filing pro-se (Lincoln saying of "He who represents himself has a fool for a client." seems to ring true).

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,
Plaintiff.

1

KENNETH L. BRYANT,
Defendant.

CASE NO. 84-0726-CR-RYSKAMP

GOVERNMENT'S RESPONSE TO
DEPENDANT'S PRO SE MOTION
TO EXPUNGE THE CLERK OF
COURT'S FILES AND RECORDS

COMES NOW, the United States of America, by and through the undersigned Assistant United States Attorney, and submits for the Court's consideration the instant Government's Response to Defendant's Pro Se Motion to Expunge the Clerk of Court's Files and Records. In opposition thereto, the government responds as follows:

I. BACKGROUND

An examination of the Court's case file¹ in this matter indicates the following: That on or about June 11, 1984, the defendant, who was then a student at Florida International University (FIU), in Miami, Florida, falsely told a FIU police officer that he was an Special Agent of the Federal Bureau of Investigation (FBI), working out of the FBI Office in Miami.

³ Records of the Federal Archives and Records Center indicate that the United States Attorney's Office's file with respect to this prosecution were destroyed in January of 1996, pursuant to standard procedure after ten years' retention in archives.

Defendant complains that although his FBI Identification Division arrest and conviction records have been expunged (which the government has confirmed through an NCIC criminal history check, that he is prejudiced by virtue of the files and records maintained by the Clerk of Court's Office for the Southern District of Florida. In essence, the defendant alleges that **he has been turned down for employment as a Special Agent with** federal law enforcement agencies (**e.g. the FBI and DEA**) **because** the existence of those records comes to the attention of federal investigators conducting applicant background checks, thus divulging his expunged/set aside criminal history.

Looking at his claims to be a federal agent, and working for the white house, I can't expect this would have been ok to work there with it on his record.

1. Archive.org of LinkedIn (https://web.archive.org/web/20220611030435/https://www.linkedin.com/authwall?trk=ripf&trkl_nfo=AQH76tZKvDd8FgAAAYFQuHW48_Op6NmK0_M3ZUTfrjO-_R4FknBRWIB2zTcFwMzmGyvpIC_S4IEkwPjQ__T_LhFVptonYxPm54R8hVavB-ir_qpwwZP2FqB5bzeTeSmBjhFAP3Uc=&original_referer=&sessionRedirect=https%3A%2F%2Fwww.linkedin.com%2Fin%2Fkennethlbryant%2F)

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This page was last edited on 21 June 2022, at 20:03.

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/mot/ - Motorola

Exhibit 8

Motorola Circle Jerk

Posting mode: Reply [[Return](#)]

Name

Email

Subject

New Reply

☐ Spoiler Image

[Wrap](#) Spoiler (CTRL + S)

Comment

File

No file chosen

Embed

Password

RlaHR%jX

(For file deletion.)

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File: [1651359325613.png](#) (511.03 KB, 750x749, Ken Bryant Immunity.png)



☐ Ken Bryant Anonymous 04/30/22 (Sat) 22:55:25 [No.13](#)

Anyone bought an Ion or other radio off Ken?

What did you get and what did you pay?

>>

☐ Anonymous 05/03/22 (Tue) 17:39:44 [No.14](#)

File: [1651599584623.png](#) (56.08 KB, 553x520, Screenshot from 2022-05-03....png)


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This guy?

>>

☐ Anonymous 05/06/22 (Fri) 04:35:09 [No.16](#)

 File: [1651811709641.jpg](#) (39.08 KB, 443x960, what's the price, ken?.jpg)

[>>14](#)

rofl, yup K1DMR. He's famous for telling you have to PM him online and won't discuss prices.

>>

☐ He's a felon too. Anonymous 06/11/22 (Sat) 05:29:12 [No.18](#)

 File: [1654925352333.jpg](#) (199.12 KB, 992x1200, page1-992px-1984-10-26_Gra....jpg)



>>16

Got this from the discord server lol

Ken Bryant Impersonation of Federal Agent Case 4-726-Cr-EATON

https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent

>>

☐ Anonymous 06/13/22 (Mon) 19:57:08 [No.19](#)
File: [1655150228305.png](#) (397.25 KB, 415x685, Call38965.png)

>>18

do "Moto Dealers" even sell IONS to hams?

do they program Police channels for ham customers?

also, would someone post a YT video of their new ION programmed on PD channels clearly showing a "Moto Dealer" as a contact?

>>

☐ Anonymous 06/13/22 (Mon) 21:06:04 [No.20](#)

File: [1655154364479.png](#) (188.24 KB, 768x558, notacopbutplaysoneonyoutub....png)



>>19

>>

☐ Anonymous 06/14/22 (Tue) 01:10:45 [No.21](#)

>>19

hah! I don't think many PDs use DMR anyways.

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Yotsuba B ▼

From the Desk of Marc Deemer

Howdy,

Back at it again, raising awareness of **Ken Bryant K1DMR** and his unethical practices.

Ken Bryant¹ is a convicted felon, serial liar and fraudster. He went off on another ham via Facebook and threatened lawsuits over a meme that was posted about him. This person researched Ken and low and behold, Ken has acted this way since he was a child. His resume is chocked full of lies and BS claims. **At 22 Ken, was even convicted felony impersonation of a federal agent!**

Ken's is now suing this ham and another 18-year-old ham for publishing his court records. The only lawyer he's able to get to take his case was disbarred for impersonating another lawyer!² His court filings are lies, lies and more lies.

Ken Bryant K1DMR, is this same person that previously sued over 40 hams in North Carolina for being removed from a network for selling radios over the air.³

Ken's Motorola dealership is nothing more than a front to sell "whored out" radios at full price. This is the practice of flashing radios with leaked internal Motorola Software, adding features without buying the license keys. North Georgia Communication sells it as a legitimately licensed radio for 1000's more than it cost. Ken bought over a dozen APX8000 radios with basic VHF licensing from Motorola ~\$1800 dealer cost and added "whore" features, selling them to unsuspecting amateurs and professional radio buyers for over \$6000 per radio. We can know the radios had blank Bluetooth addresses, leaving it broken once enabled by unsuspecting buyers!

He's a sue happy individual, and has no business in ham radio. If he shows up at your meeting or hamfest, show him the exit. Do not engage with him, or you may find yourself the target of his lawsuit machine.

Please enjoy the included awareness cards and feel free to hand them out at upcoming hamfests spreading the word about Ken Bryant.

73 de Marc Deemer
dmrmarc@proton.me

¹ <https://ngacomms.com>

² <https://www.ncbar.gov/Orders/Kirby.%20John%20M%20Consent%20Order%20of%20Disclp%20OCR.pdf>

³ <https://forums.radioreference.com/threads/ham-banned-from-dmr-network-sues-in-state-court-to-regain-access.333212/>

DMR-MARC
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Chicago, IL 60661-3781

CAROL STREAM IL 601

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